STATE OF SOUTH CAROLINA

BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2017-305-E

| In Re: |) | |
|--|---|-----------------------|
| Request of the South Carolina Office of Regulatory Staff for Rate Relief to SCE&G Rates Pursuant to S.C. Code Ann. § 58-27-920 |) | PETITION TO INTERVENE |

The South Carolina Coastal Conservation League ("CCL") hereby petitions the Public Service Commission of South Carolina ("Commission") to intervene in the above-captioned docket pursuant to R. 103-825 of the Commission's rules. In support of this petition, CCL states as follows:

- 1. On September 26, 2017, the Office of Regulatory Staff ("ORS") filed a Request for Rate Relief, asking the Commission to order SCE&G to suspend immediately collection of all rates revised under the BLRA, and if the BLRA is amended, repealed or declared unconstitutional, to order SCE&G to cease and desist from collecting revised rates and to refund prior revised rates to customers.
- 2. CCL is a nonprofit corporation organized under the laws of the State of South Carolina. The principal address of CCL is P.O. Box 1765, Charleston, South Carolina 29402. CCL promotes the implementation of comprehensive local, state, and federal energy policies related to renewable energy, energy efficiency, and climate change. CCL has members in South Carolina who receive electricity service from SCE&G and are subject to the impacts of SCE&G's rates.

- 3. CCL has participated in numerous prior proceedings related to, among other things, the V.C. Summer nuclear units and SCE&G's resource planning and energy efficiency programs. CCL seeks to intervene in this proceeding to ensure that its members' interests in promoting clean energy resources for customer bill relief are represented.
- 4. If allowed to intervene, CCL will advocate for clean energy solutions that provide bill relief for SCE&G customers. CCL has not otherwise formulated its position in this proceeding. CCL plans to present its position in comments or prefiled testimony, as specified by the Commission.
 - 5. CCL is represented by the following counsel in this proceeding:

J. Blanding Holman, IV Elizabeth Jones Southern Environmental Law Center 463 King Street, Suite B Charleston, SC 29403 Telephone: (843) 720-5270

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WHEREFORE, CCL prays that it be allowed to intervene in this matter.

Respectfully submitted this 27th day of September, 2017.

s/ J. Blanding Holman, IV
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Attorneys for Petitioner South Carolina Coastal Conservation League

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| m re. |) | |
| Request of the South Carolina |) | |
| Office of Regulatory Staff for |) | CERTIFICATE OF SERVICE |
| Rate Relief to SCE&G Rates |) | |
| Pursuant to S.C. Code Ann. |) | |
| § 58-27-920 |) | |
| |) | |

I certify that the following persons have been served with one (1) copy of the foregoing Petition to Intervene by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

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This 27th day of September, 2017.

s/ Andrea Rachel Pruzin